

STATE OF OHIO                     )  
  ) SS:  
COUNTY OF SUMMIT            )

**UNITED STATES POSTAL INSPECTION SERVICE**

I, MARC A. KUDLEY, DO HEREBY DEPOSE AND SAY:

1. I am a United States Postal Inspector and have been so employed since May 2012, presently assigned at the U.S. Postal Inspection Service (USPIS) Cleveland, Ohio Field Office to the Contraband Interdictions and Investigations Group, which strives to protect the U.S. Mail from dangerous drugs and illegal contraband, specifically illicit drugs and firearms. I have received training in the detection and investigation of drug trafficking. I have worked drug trafficking investigations involving the U.S. Mails since August 2012, during which time I have been involved in narcotics investigations leading to prosecution in U.S. District Court, as well as state courts.
2. I know based on training and experience that U.S. Mail is often used by narcotic traffickers to transport controlled substances. I know from my training and experience that the Priority Mail Express and Priority Mail systems are commonly used to transport controlled substances because Priority Mail Express and Priority Mail provide traceability, reliability, and timely delivery. The guaranteed delivery timeframe of approximately one day for Priority Mail Express and two to three days for Priority Mail places time pressures on law enforcement agents to identify, search, and deliver these drug parcels in a timely manner.
3. On October 2, 2019, while conducting parcel interdiction at the Akron, Ohio Main Post Office, I identified U.S. Postal Service Priority Mail Express parcel bearing tracking number EE177371527US, addressed to Anthony Thompson, 1315 Marcy St, Akron, OH 44301, with a return address of Rashad Sowell, 1052 ½ W 57<sup>th</sup>, Los Angeles, CA 90037 (hereinafter "USPS parcel EE177371527US").
4. USPS parcel EE177371527US is described as a white Priority Mail Express Mailing Box measuring approximately 12.5" X 3.5" X 15" in size and weighing approximately 4 pounds, 15 ounces. I identified this as a suspect drug parcel based on several characteristics, including but not limited to type of mail, origin, destination, and size.
5. USPS parcel EE177371527US was mailed from the Los Angeles, CA 90020 Post Office on October 1, 2019 and bore \$67.15 in U.S. Postage. Your affiant knows California has historically been a source area for mailed controlled substances into Northern Ohio.
6. I made inquiries with CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, concerning the delivery address of 1315 Marcy St, Akron, OH 44301, and was unable to associate an individual with the name Anthony Thompson at the address.

7. I also made inquiries with CLEAR concerning the return address of 1052 ½ W 57<sup>th</sup>, Los Angeles, CA 90037 and was unable to associate an individual with the name Rashad Sowell at the address.
8. I know based on training and experience, that individuals using the U. S. Mails for the purpose of transporting controlled substances will often place fictitious address, name and/or phone number information, different variations of their names, or no names at all on these parcels, to conceal their true identities from law enforcement should the parcel be seized.
9. On October 2, 2019 at the U.S. Postal Inspection Service Office located in Akron, OH, USPS parcel EE177371527US was placed into a lineup containing several blank parcels which emanated no narcotics odors. Narcotic detection canine "Cruiser", handled by Detective Chris Carney of the Akron Police Narcotics Unit was allowed to examine the lineup. According to Detective Carney, Cruiser gave a positive alert on USPS parcel EE177371527US and none of the blank parcels. According to Detective Carney, this positive alert meant Cruiser detected the odor of an illegal drug emanating from USPS parcel EE177371527US.
10. Detective Carney has been State Certified as a Narcotics Canine handler and he and narcotics canine Cruiser have worked together since 2010. Detective Carney and canine Cruiser were both certified in September of 2019 by the Ohio Peace Officers Training Academy (OPOTA) as a specialty purpose K-9 team, narcotic detection. During this time, Cruiser was trained and certified to alert to the presence of the odors from marijuana, cocaine, heroin, methamphetamine and their derivatives. Detective Carney has been trained how to handle a detector K-9 and read their alerts. According to Detective Carney, Cruiser is a reliable K-9 assist unit.
11. I know based on training and experience that individuals who regularly handle controlled substances often leave the scent of controlled substances, which narcotic canines are trained to indicate alert, on the box, contents of the box, and/or other packaging material they handle.
12. Based on the foregoing information stated herein, your Affiant applied for and was granted a federal search warrant on October 2, 2019, in U.S. District Court in the Northern District of Ohio, Eastern Division, by the Honorable Magistrate Judge Kathleen B. Burke. The execution of the search warrant revealed approximately four pounds of an off-white crystalline substance that field tested positive for methamphetamine, a Schedule II controlled substance. The suspect methamphetamine was separated inside four separate zip lock bags weighing approximately one pound each and concealed in vacuum sealed food saver bags and cellophane.

13. Based on my review of U.S. Postal Service business records, I identified a second related parcel that was also mailed on October 1, 2019, approximately one hour earlier than USPS parcel EE177371527US, from a different post office in Los Angeles, CA. The two post offices from where the two U.S. Postal Service parcels were mailed are approximately 3.75 miles apart from each other. The second parcel is destined for an address approximately a half mile away from 1315 Marcy St, Akron, OH 44301, the stated delivery address of USPS parcel EE177371527US.
14. The second identified parcel is described as U.S. Postal Service Priority Mail parcel bearing tracking number 9505 5156 3773 9274 3502 20, addressed to Sabrina Bailey, 1306 Girard St Apt 1, Akron, OH 44301, with a return address of Vaughn Williams, 9214 S Budlong Ave, Los Angeles, CA 90044 (hereinafter "USPS parcel 9505 5156 3773 9274 3502 20").
15. USPS parcel 9505 5156 3773 9274 3502 20 is described as a white Priority Mail Medium Flat Rate Box measuring approximately 12.5" X 3.5" X 14" in size and weighing approximately 5 pounds, 2 ounces. I identified this as a suspect drug parcel based on several characteristics, including but not limited to type of mail, origin, destination, and size.
16. USPS parcel 9505 5156 3773 9274 3502 20 was mailed from the Los Angeles, CA 90016 Post Office on October 1, 2019 and bore \$14.35 in U.S. Postage. Your affiant knows California has historically been a source area for mailed controlled substances into Northern Ohio.
17. I made inquiries with CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, concerning the delivery address of 1306 Girard St Apt 1, Akron, OH 44301 and was unable to associate an individual with the name Sabrina Bailey at the address.
18. I also made inquiries with CLEAR concerning the return address of 9214 S Budlong Ave, Los Angeles, CA 90044 and was unable to associate an individual with the name Vaughn Williams at the address.
19. I know based on training and experience, that individuals using the U. S. Mails for the purpose of transporting controlled substances will often place fictitious address, name and/or phone number information, different variations of their names, or no names at all on these parcels, to conceal their true identities from law enforcement should the parcel be seized.

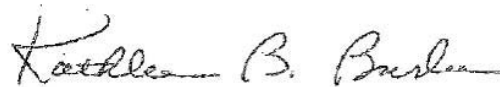
20. On October 3, 2019 at the U.S. Postal Inspection Service Office located in Akron, OH, USPS parcel 9505 5156 3773 9274 3502 20 was placed into a lineup containing several blank parcels which emanated no narcotics odors. Narcotic detection canine "Cruiser", handled by Detective Chris Carney of the Akron Police Narcotics Unit was allowed to examine the lineup. According to Detective Carney, Cruiser gave a positive alert on USPS parcel 9505 5156 3773 9274 3502 20 and none of the blank parcels. According to Detective Carney, this positive alert meant Cruiser detected the odor of an illegal drug emanating from USPS parcel 9505 5156 3773 9274 3502 20.
21. Based on the information contained herein, your Affiant maintains there is probable cause to believe that U.S. Postal Service Priority Mail parcel bearing tracking number 9505 5156 3773 9274 3502 20, addressed to Sabrina Bailey, 1306 Girard St Apt 1, Akron, OH 44301, with a return address of Vaughn Williams, 9214 S Budlong Ave, Los Angeles, CA 90044, contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).



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MARC A. KUDLEY  
POSTAL INSPECTOR

This affidavit was sworn to by the affiant, who did no more than attest to its contents pursuant to Crim. R. 4.1 (b)(2)(A), by telephone after a PDF was transmitted by email, per Crim R. 4.1 THIS 3<sup>rd</sup> DAY of OCTOBER 2019.



Kathleen B. Burke, U.S. Magistrate Judge